

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jose Ignacio MORENO SERVELLON
Diego David PONCE

Case No. 24-30302

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 28, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1), 846
18 U.S.C. § 924 (c)

Conspiracy to distribute controlled substances
Possession of firearms in furtherance of drug trafficking

This criminal complaint is based on these facts:

See attached affidavit

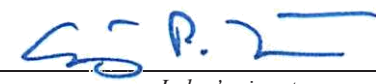
☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 30, 2024

City and state: Detroit, MI


Complainant's signature
Special Agent James Richmond
Printed name and title


Judge's signature
Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, James Richmond, Special Agent with the United States Drug Enforcement Administration (DEA), being duly sworn, depose and state the following:

INTRODUCTION

1. Your affiant is a Special Agent of the DEA and has been so since November 2016. Prior to the DEA, I served 4 years in the Marine Corps with the Marine Occupational Specialty of an Infantry Officer. After completion of Infantry Officer Course, I was assigned as a Rifle Platoon Commander, and later deployed to Afghanistan, where I witnessed the cultivation and trafficking of opium.

2. My official DEA duties include investigating criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. Some of the specialized training I have received includes, but is not limited to, classroom instruction concerning narcotics smuggling, money laundering investigations, conspiracy, complex investigations, and undercover. I have been involved in various types of undercover assignments, and in various drug investigations utilizing electronic surveillance, including the interception of wire communications, the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution and transportation of

controlled substances, the laundering and concealing of proceeds from drug trafficking and the street gangs who participate in these illegal activities.

3. As a result of these investigative activities, I have conducted and participated in numerous investigations as a DEA Special Agent that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine, and heroin. I make this affidavit, in part, based on personal knowledge derived from my participation in this investigation and, in part, based upon information from oral and written reports about this investigation and others that I have received from United States law enforcement officers and Special Agents of the Drug Enforcement Administration. I am aware of the following information from several sources, including but not limited to, my own personal observations and participation in this investigation and my review and analysis of oral and written reports.

4. This affidavit is made in support of a criminal complaint for Jose Ignacio MORENO SERVELLON and Diego David PONCE for possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); attempt and conspiracy to commit the same, in violation of Title 21, United States Code, Section 846; and possession of firearms in furtherance of drug trafficking, in violation of Title 18, United States Code, Section 924(c).

5. In May 2024, a confidential informant informed DEA that an individual was attempting to sell him/her a distribution level quantity of methamphetamine. Through independent investigation, the DEA corroborated significant portions of the informant's information and identified Jose Ignacio MORENO SERVELLON as the person suspected of drug trafficking. DEA began tracking MORENO SERVELLON's movements through a warrant for the location data from his cell phone.

6. As a result of the DEA investigation, including from the location data, on July 28, 2024, at approximately 7:50 p.m., DEA located a white Ford Transit 150 bearing Kentucky Temporary Plate "B933959", in-vicinity of US 20 and I-75 South in Perrysburg Ohio. The white Ford Transit 150 proceeded to travel I-75 South in tandem with a S60 Volvo bearing Illinois Plate "EK15858", at which time the driver of the white Ford Transit 150 was positively identified as Jose Ignacio MORENO SERVELLON. Both vehicles travelled in tandem Northbound 23 to I-94 East, varying speeds both above and below the posted speed. The route and driving behavior observed on this date is indicative of traffickers avoiding law enforcement detection.

7. At approximately 8:58 p.m., the Ford Transit 150 and the Volvo S60 pulled into the Home Depot parking lot located at 11100 Telegraph road, Taylor Michigan (MI), and circle the lot until they parked on the East side of Del Taco

located at 11386 Telegraph Road, Taylor MI. At that time MORENO SERVELLON was observed exiting the driver's side of the white Ford Transit 150, and proceeded to enter the front passenger side of the S60 Volvo. Based upon the information obtained by DEA, Michigan State Police (MSP) and DEA agents conducted a traffic stop of the S60 Volvo, at which time the driver of the S60 Volvo was positively identified by his California driver's license as Diego David PONCE. PONCE and MORENO SERVELLON were arrested by state law enforcement officers for violations of state drug trafficking laws. During a search of the S60 Volvo, agents/officer found a loaded Springfield Hellcat pistol on the front center console, next to where PONCE had been sitting. An unloaded Springfield Hellcat pistol was located on the front passenger floorboard where MORENO SERVELLON had been sitting, with a loaded magazine, and a loose 9mm round on the floor.


8. An MSP K-9 conducted an interior search of the white Ford Transit 150 and gave a positive indication on the interior cargo floorboard. A subsequent search of the cargo compartment revealed an electronically controlled concealed compartment containing a distribution level quantity of suspected packaged methamphetamine, as depicted:



9. These various-sized plastic-wrapped packages were weighed at 55.47 gross kilograms and the contents were later field tested positive for crystal methamphetamine.

CONCLUSION

10. Based on the facts stated above, there is probable cause to believe that Jose Ignacio MORENO SERVELLON and Diego David PONCE have each possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); attempt and conspiracy to commit the same, in violation of Title 21, United States Code, Section 846; and possessed firearms in furtherance of drug trafficking, in violation of Title 18, United States Code, Section 924(c).



SA James Richmond
Drug Enforcement Administration

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Anthony P. Patti
United States Magistrate Judge
July 30, 2024